

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of AnChain.AI, Inc.

On September 9, 2025, Crypto Task Force Staff met with representatives from AnChain.AI, Inc.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. AnChain.AI, Inc. representatives provided the attached document, which was discussed during the meeting.



AnChain.AI Meeting Request Submission

To: SEC Crypto Task Force

Topic: Interpretation of Rules and Forms in Digital Asset Compliance

Submission date: Aug 21, 2025.

Contact: Victor Fang, Ph.D. CEO & Founder, AnChain.AI, San Jose, California.

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Summary of Issues to Discuss

AnChain.AI, an AI-powered blockchain analytics and financial crime compliance platform, respectfully requests a meeting with the SEC Crypto Task Force to discuss the interpretation and application of existing **rules and forms** as they apply to crypto assets and compliance workflows.

Our experience working with both U.S. government agencies (e.g., SEC (Exam, Enforcement), IRS, law enforcement) and regulated financial institutions has highlighted several areas where interpretive clarity would greatly benefit the industry, particularly in ensuring robust compliance without stifling innovation.

Proposed Agenda

1. Interpretation of Key Rules & Forms

- Clarification on how current securities and AML-related rules/forms (e.g., Form D, Form 144, Form 13F, Suspicious Activity Reports (SARs)) apply to digital asset transactions.
- Discussion of gaps where existing rules/forms do not fully address crypto-specific risks or disclosures, such Smart Contract based digital assets: RWA (Real World Assets), NFT, DeFi, Cross Chain Bridges, Privacy Protocols (Railgun, Tornado Cash, etc) .

2. Transparency and Disclosure Expectations

- Expectations for issuers and intermediaries around wallet addresses, smart contracts, and transaction traceability in required disclosures.



- Best practices for ensuring disclosures are accurate, complete, and verifiable in the context of pseudonymous blockchain systems.

3. **AML and Sanctions Compliance Integration**

- How the SEC interprets its jurisdiction relative to FinCEN and OFAC guidance, particularly for crypto exchanges, custodians, and DeFi protocols.
- Guidance on reconciling SEC filing obligations with AML/sanctions screening obligations.

4. **Forms Modernization Opportunities**

- Potential enhancements or modifications to existing forms to better capture digital asset activities (e.g., digital wallet identifiers, smart contract audit attestations, token issuance details).
- Opportunities for leveraging **AI-driven compliance automation** to improve accuracy and reduce burdens for registrants.

5. **Cross-Agency Coordination**

- How SEC's interpretations align with parallel guidance from CFTC, FinCEN, OFAC, and banking regulators.
- Suggestions for frameworks that reduce regulatory overlap and ambiguity for financial institutions.

Objective

The goal of this meeting is to:

- Promote dialogue between regulators and compliance technology providers.
- Provide real-world insights from financial institutions, government investigations, and crypto market participants.
- Offer constructive recommendations for aligning SEC forms/rules with the unique risks and transparency needs of the digital asset ecosystem, esp. Artificial Intelligence, Smart Contracts, Privacy Protocols, etc.